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**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

ADMIRAL INSURANCE COMPANY,

Plaintiff,

vs.

KABUL, INC. d/b/a FASTRIP PWC RENTALS,  
 KABUL, INC. d/b/a FASTRIP FOOD STORE,

Defendants.

**Case No.:**

**2:24-cv-02060-GMN-MDC**

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR KABUL,  
 INC. TO RESPOND TO  
 ADMIRAL'S MOTION TO  
 CONSOLIDATE(#57)  
 (FIRST REQUEST)**

KABUL, INC., dba FASTRIP PWC and  
 FASTRIP FOOD STORE,  
 Counter/Cross/Third Party Claimant,  
 v.  
 ADMIRAL INSURANCE COMPANY,  
 GREGG EIDSNESS FARM BUREAU  
 FINANCIAL SERVICES, NBS Insurance  
 Agency, Inc. aka NATIONWIDE  
 BROKERAGE SOLUTIONS, RT SPECIALTY,  
 RSG SPECIALTY, LLC, RYAN SPECIALTY,  
 LLC, ERIK W. FOX, WOLFE & WYMAN,  
 LLP, KEVIN R. STOLWORTHY,  
 ARMSTRONG TEASDALE, LLP, and DOES I  
 through X, inclusive; and ROE  
 CORPORATIONS I through X, inclusive,  
 Counter/Cross/Third Party Defendants.

1 The parties, by and through their respective counsel, hereby stipulate and agree, subject to  
2 this Court's approval, to extend the time for Defendant/Counter/Cross/Third Party Claimant  
3 KABUL, Inc. ("Kabul") to respond to a Motion to Consolidate filed by  
4 Plaintiff/CounterDefendant Admiral Insurance Company ("Admiral") in an effort to promote  
5 overall efficiency and judicial economy. THEREFORE, the parties stipulate and request that the  
6 Court enter an order approving the proposed extension as set forth below.  
7

8 WHEREAS, on or about June 10, 2025, Kabul filed its Answer and Counter/Cross/Third  
9 Party Complaint. (ECF#33) wherein additional parties and claims were added to the case.

10 WHEREAS, on July 22, 2025, Admiral filed a Special Motion to Dismiss Counterclaims  
11 Pursuant to NRS 41.660 (ECF#48), a Motion to Dismiss Pursuant to FRCP 12(B)(6) (ECF#49),  
12 and a Request for Judicial Notice (ECF#50). The responses to these Motions are currently due  
13 September 5, 2025. (See ECFs#59 and #60)  
14

15 WHEREAS the parties hereto have met and conferred regarding extending the deadline to  
16 the pending Motion to Consolidate. (ECF#57)

17 WHEREAS this is the first request to extend the deadline and good cause exists based  
18 upon scheduling conflicts and the desire to consolidate responses for judicial efficiency. Lead  
19 Counsel for Plaintiff was out of the office visiting family at the time the Motion was filed; also,  
20 he has a cruise planned for 14 days in August and will have limited internet capabilities. The  
21 plaintiff's counsel's firm consists of only two lawyers. The other lawyer was away from the  
22 office during the last part of July and during the beginning and middle of August due to moving  
23 children to colleges across the country (and even abroad). Therefore, responding timely to the  
24 Motion to Consolidate is not practical or possible and it makes more sense to have all responses  
25 filed together on September 5, 2025. Additionally, the related case that Admiral is seeking to be  
26  
27  
28

consolidated was filed in State Court and removed to this Court. Kabul has moved for remand and Admiral has responded (ECFs #22 and #28 in 2:25-cv-01343-APG-MDC). Kabul's Reply in support of the Motion to Remand is due August 19, 2025 so that Motion will then be ripe for decision. Therefore, for judicial economy, it is beneficial to extend the time for the response to the Motion to Consolidate herein.

IT IS HEREBY STIPULATED by and among counsel for Admiral and Kabul that the deadline for Kabul's response to the Motion to Consolidate (ECF#57) shall be extended to September 5, 2025.

IT IS SO STIPULATED.

Dated this 18th day of August, 2025.

CHRISTENSEN LAW OFFICES, LLC

BY: /s/Thomas Christensen

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: August 19, 2025